

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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KENNETH AND PAMELA PRICE JEAN \*

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Plaintiffs \*

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v. \*

\*

CITY OF ASHBURNHAM POLICE \*

\*

DEPARTMENT, CITY OF WINCHENDON \*

\*

POLICE DEPARTMENT, ROB HARRINGTON, \*

in his capacity as CHIEF OF THE WINCHENDON \*

**C.A. NO. 03-12306FDS**

POLICE DEPARTMENT, JACK MURRY, in his \*

capacity as CHIEF OF THE ASHBURNHAM \*

POLICE DEPARTMENT, TODD C. PARSONS \*

RAYMOND M. ANAIR, ROBERT BRENNON, \*

WILLIAM P. GEOFFROY, BRIAN HART, \*

KEVIN AHEARN, KEVIN E. WOLSKI \*

OFFICER JOHN DOE, OFFICER JOHN POE. \*

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Defendants \*

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**MOTION TO EXTEND TIME FOR EXPERT WITNESS DISCLOSURE**

Now come the plaintiffs and moves this Honorable Court extend the time for expert witness disclosure for sixty (60) days, from September 15, 2006 as set by the court's amended scheduling order of June 22, 2006, until November 14, 2006.

As reason, plaintiffs state that their medical and mental health expert, Dr. Stuart Grassian (sp) has held initial examinations of the plaintiffs, but has not had the opportunity to complete his analysis or prepare his report. As further reason, plaintiffs state that Dr. Grassian's report would relate to damages and not liability and therefore would not effect dispositive motions which, in any event, are not due until January 15, 2007 and this delay does not otherwise prejudice any party or delay scheduling of trial, as the expert witness disclosure would be filed well before dispositive motions are due or the pretrial conference scheduled for March 15, 2007.

Plaintiffs further suggest that defendants' time for filing their expert witness disclosure be likewise extended for sixty (60) days.

Respectfully submitted,  
Pamela Jean,  
by her counsel,

/s/ Mark Stern  
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Date: September 15, 2006

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Respectfully submitted,  
Kenneth Jean,  
by his counsel

/s/ Andrew M. Fischer  
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Date: September 15, 2006